

## **Enclosure 3**

# **December 2005 Progress Report Document South Carolina's Comprehensive Maintenance Plan**



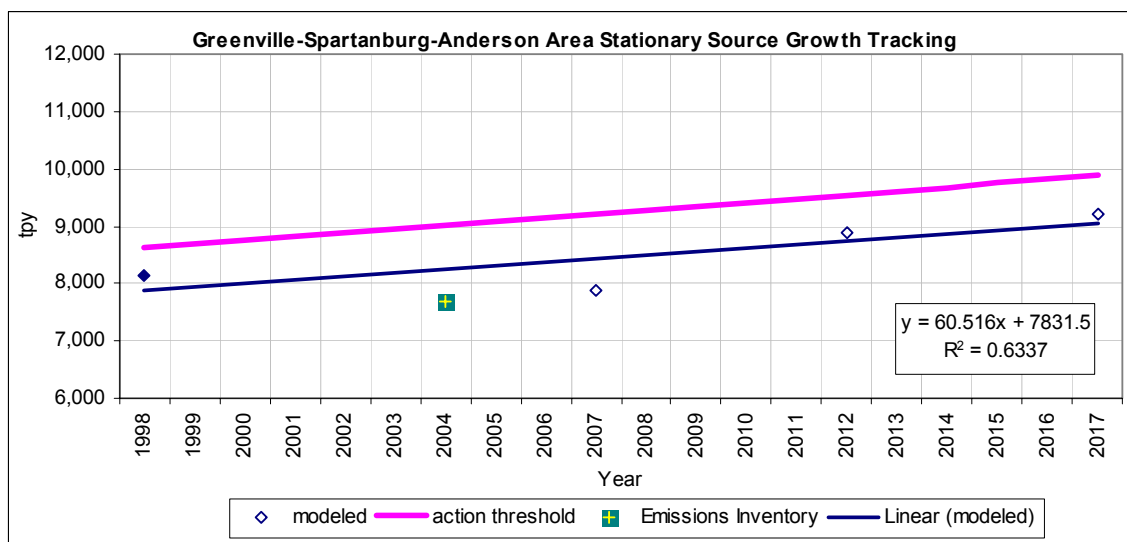
**Enclosure 3**  
**South Carolina's Ozone Early Action Compact**  
**December 2005 Progress Report**  
**Comprehensive Maintenance Plan**  
**December 22, 2005**

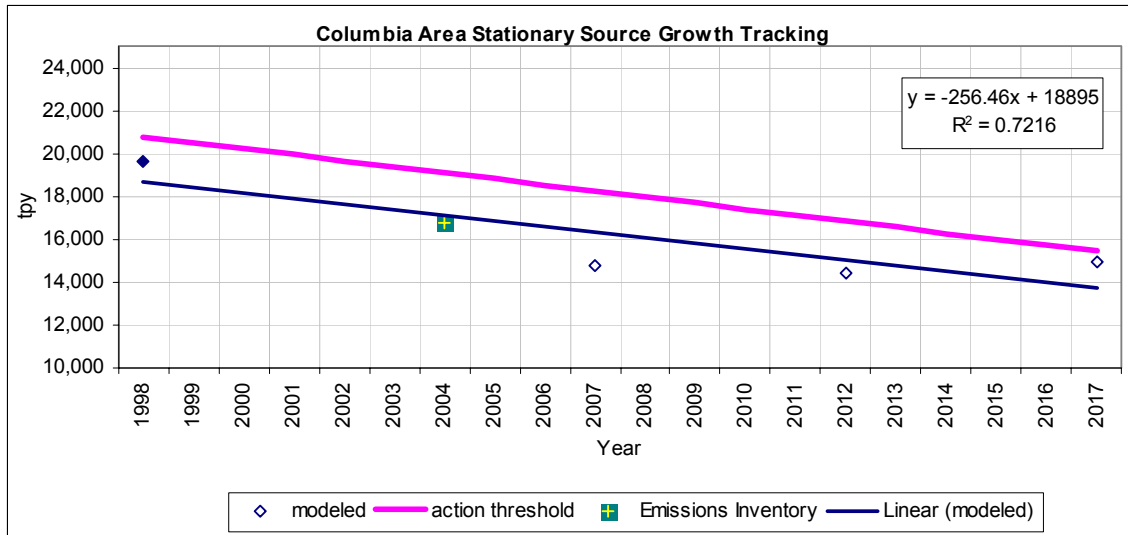
South Carolina has committed to a comprehensive maintenance plan. This commitment far exceeds the maintenance requirements in the EAC protocol. The South Carolina EAC maintenance plan is similar to the requirements for section 175A of the Clean Air Act, none of which are required for EAC areas. A Notice of General Public Interest was published in the *State Register* on May 27, 2005, scheduling a thirty-day public notice and comment period. A public hearing was held on June 30, 2005.

South Carolina's commitment included an annual review of growth (highway mobile and stationary NO<sub>x</sub> sources) to ensure emission reduction strategies and growth are adequate as well as identification and quantification of federal, state, and/or local measures indicating sufficient reductions to offset growth estimates. The Departments' review found that for both areas designated nonattainment with the effective date deferred, the actual emissions were lower than the forecasted modeled data and the 2004 VMT was well below the action trigger.

#### **Annual Review of Growth**

The most recent emissions inventory (2004) was compared to the emissions used in the ozone modeling analysis with a base year of 1998. In order to compare the annual emissions to the assumptions made in the model, a regression equation for each deferred area was developed in order to forecast the emissions for years not modeled. The modeled data, forecasted data, the 10 percent "action level" and actual emissions for 2004 were then plotted in order to determine whether the 2004 emissions were still comparable to the ozone modeling assumptions. For both deferred areas, the actual emissions were lower than the forecasted modeled data. The ozone modeling analysis could not be run on partial counties, so for the Columbia deferred area, the review of growth took the county-wide emissions into account. Therefore, the number for the Columbia deferred area represents a conservative estimate of the emissions.





A similar process was used to compare the most recent annual VMT (2004) with the projected VMT from the ozone modeling analysis. Because full -county VMT data was used for the ozone modeling analysis, it was necessary to use combined full county data from Richland and Lexington County to represent the Columbia nonattainment area. For both the Columbia and the Greenville-Spartanburg-Anderson deferred areas, the review revealed that the 2004 VMT was slightly below the modeled trend line and well below the action trigger.

